

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**JOYCE RULAPAUGH  
45605 Catalina Lane  
California, MD 20619  
Plaintiff**

**ST. MARY'S COUNTY GOVERNMENT  
PO Box 653  
Leonardtown, MD 20650**

BY W DEPUTY

**COMPLAINT FOR INJUNCTIVE RELIEF**

COMES NOW the Plaintiff, JOYCE RULAPAUGH, pro se', and hereby files this action under the Freedom of Information Act, 5 U.S.C. §552 to order the production of agency telephone records, and in support thereof states as follows:

1. This court has jurisdiction over this action pursuant to 5 U.S.C. §552(a)(4)(B).
2. The Plaintiff is a private citizen and is the requester of the records, which defendant is now withholding. Plaintiff has requested this information for use in evaluating causation and damages in a potential separate civil action, and prompt release of the information is essential to the Plaintiff receiving ordered relief that is vitally necessary for her to avoid further significant personal and financial harm.
3. The St. Mary's County Government and the St. Mary's Board of County Commissioners are government agencies and have possession of the documents that the Plaintiff has requested.
4. Attached as Exhibit A, is a letter sent/mailed on October 26, 2018, in which the Plaintiff requested access to telephone records maintained by the St. Mary's County Government.
  - a. Attached as Exhibit B, is a response from the Acting County Attorney.
  - b. Attached as Exhibit C, is my email response, which includes a corrected version of my original FoIA letter.

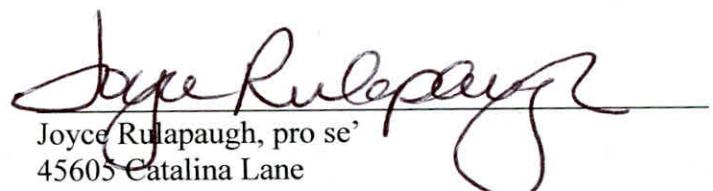
- c. Attached as Exhibit D, is an Affidavit of Indigency.
- d. Attached as Exhibit E is my Social Security Disability Statement.
- e. Attached as Exhibit F is a response from the Acting County Attorney stating that my Waiver of Fees/Affidavit of Indigency was denied.

5. As of the date of filing, no further response has been received thereto.
6. Plaintiff has made good faith efforts to resolve the issue and to request the overdue documentation, but no documents have been forthcoming.
7. Plaintiff has a right of access to the requested information under 5 U.S.C. §552(a)(3), and there is no legal basis for any denial of such access by the Defendant.

WHEREAS, the Plaintiff respectfully requests that this Honorable Court:

- A. Order the Defendant to provide access to the requested documents;
- B. Expedite this proceeding as provided for in 28 U.S.C. §1657;
- C. Award plaintiff costs and fees associated with the filing in this action, as provided in 5 U.S.C. §552(a)(4), in addition to any and all damages suffered by the Plaintiff as a result of the Defendant's actions, and
- D. Grant such other and further relief as may deem just and proper.

Respectfully Submitted,



\_\_\_\_\_  
Joyce Rulapaugh, pro se,  
45605 Catalina Lane  
California, MD 20619  
301-752-5050  
[Joyce.rulapaugh@live.com](mailto:Joyce.rulapaugh@live.com)